

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Chevron Pipeline Company
Chevron Pipe Line Co - Henry Compressor Station
Henry, Vermilion Parish, Louisiana
Agency Interest Number: 24332
Activity Number: PER20080002
Proposed Permit Number: 2940-00025-V2**

I. APPLICANT

Company:
Chevron Pipeline Company
2811 Hayes Rd
Houston, Texas 77082

Facility:
Chevron Pipe Line Co - Henry Compressor Station
5625 Aristide Rd
Henry, Vermilion Parish, Louisiana
UTM coordinates :589.906 kilometer East and 3308.319 kilometer North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Henry Compressor Station is an existing natural gas compressor station facility began operation in 2001. It currently operates under Permit No. 2940-00025-V1, issued November 11, 2004.

The facility submitted timely renewal application.

III. PROPOSED PROJECT/PERMIT INFORMATION

Proposed Permit

Permit application and Emission Inventory Questionnaire were submitted by Chevron Pipeline Company, on November 13, 2008, requesting a Part 70 operating permit renewal/modification.

- Replace the modular gas generators and turbine components during manufacture recommended maintenance and turbine overhauls with a like kind of replacement. Revise the NO_x, CO, and VOC emission for the two Solar Centaur gas turbines with vendor recommended emission factor;

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- Reduce the allowable operating hours on the standby generator engine;
- Update calculation methodologies for the condensate storage tank, condensate truck loading point, and fugitive emissions.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	2.94	2.77	-0.17
SO ₂	0.25	1.40	+1.15
NO _x	156.85	248.63	*+91.78
CO	39.05	126.17	*+87.12
VOC	3.25	15.59	+12.34

*Emissions are increased due to vendor's recommended emission factor.

IV REGULATORY ANALYSIS

The permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, and New Source Performance Standards (NSPS) apply. Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

Louisiana Air Quality Regulations and NSPS

The applicability of the appropriate regulations is straightforward and provided in the Facility Requirement Section of the draft permit, or Table 2 of the Air Permit Briefing Sheet. Similarly, the Monitoring, Reporting, and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions, and standards are provided in the Facility Specific Requirements Section of the draft permit, or explained in Table 2 of the Air Permit Briefing Sheet.

Prevention of Significant Deterioration/Nonattainment Review

This permit is a renewal which will include updating LAC 33:III.15 (Emission Standards for Sulfur Dioxide, adding the nonapplicability of 40 CFR 60 Subpart JJJJ (Engine Regulations) to the permit. There is no physical change or change in the method of operations, therefore, PSD and non-attainment New Source Review do not apply.

MACT Requirements

This facility is classified as a minor source of Toxic Air Pollutants (TAP). MACT is not required.

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Air Quality Analysis

Emissions associated with the proposed renewal/modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

This permit does not include any permit shield.

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VI. PERIODIC MONITORING

See Specific Requirements

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

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Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.